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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Advanced Television Systems | ) | |
| and Their Impact upon the | ) | MM Docket No. 87-267 |
| Existing Television Broadcast | ) | |
| Service | ) | |

To: The Commission

<u>CONSOLIDATED PETITION FOR RECONSIDERATION OF</u>
<u>FIFTH REPORT AND ORDER AND SIXTH REPORT AND ORDER</u>
BY
<u>ABACUS TELEVISION; JOSE LUIS RODRIGUEZ; THE VIDEOHOUSE, INC</u>.
("<u>URBAN LPTV PARTIES</u>")

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June 13, 1997

To: The Commission

CONSOLIDATED PETITION FOR RECONSIDERATION OF
FIFTH REPORT AND ORDER AND SIXTH REPORT AND ORDER
BY
ABACUS TELEVISION; JOSE LUIS RODRIGUEZ; THE VIDEOHOUSE, INC.
("URBAN LPTV PARTIES")

Abacus Television, Jose Luis Rodriguez, and the Videohouse, Inc. (herein, "Urban LPTV Parties" or "Petitioners") by their attorney, here seek reconsideration of two actions herein, the Fifth Report and Order, 62 F. Reg. 26996, May 16, 1997 ("5R&O"), and the Sixth Report and Order, 62 F. Reg. 26684, May 14, 1997 ("6R&O"). Petitioner Abacus Television has been active in this proceeding and these Urban LPTV Parties will continue to participate.

**Abacus Television** operates three Low Power Television stations: W28AW, Greenberg, PA; W09CF, Jacksonville, FL; and W20AN in Washington, PA. Abacus also has nearly completed construction and this summer expects to activate additional LPTV stations, including a grouping of eleven stations configured as a "cellular television" installation throughout Pittsburgh, Wheeling, WV, and Youngstown and Steubenville, Ohio. **Jose Luis Rodriguez** is completing construction of W44BC, to serve Brentwood (Long Island), NY, with a specialized, Spanish language format. **The Videohouse, Inc.** operates W61CC in downtown Pittsburgh, and its principal, Ron Bruno, serves as Secretary and Board Member of the Community Broadcasters Association. Our perspective is that of many LPTV operators in the largest television markets, and we comment jointly as an informal grouping, "Urban LPTV Parties."

Petitioners recognize that an acute channel shortage exists in major markets, as evidenced by the necessity in the proceeding to allot non-core channels in many instances, for the DTV build out by full service TV broadcasters. At least in some markets, it would have "broken the bank" to allot second channels for LPTV service as well. Realistically, we anticipate using the existing assigned channel to make a transition to DTV service, as market conditions permit. The crux of the problem is that the transition period was designed with little or no regard for LPTV and TV translator impact. Only with the Sixth Further Notice herein did the Commission begin to take the first steps. While the actions according displacement relief, and other ameliorative actions here are most welcomed, we believe that more is possible, and needed.

**1. The Commission Should Withhold Final Action on the Reallotment of Channels 60 to 69 Until After the Transition.**

Once the transition is completed, in the year ± 2006, it is reasonable to expect that ample spectrum will be available to effect a "re-packing" into a cohesive channel core, whether that core consists of Channels 2 to 51 or some other grouping, perhaps excluding the Low Band VHF channels. By the final switch-over date, roughly 1,600 dual licensees, declared eligible for a second channel as of April 3, 1997, and receiving such channel shortly thereafter, will relinquish one channel, and the shortage of television broadcast channels nation-wide will decline by at least 50 per cent.

This salutary development will permit the implementation of several important public interest goals concurrently. First, where difficult design or interference problems have arisen during the DTV rollout -- especially in the major markets -- new channel assignments can be re-used to resolve interference cases, and to facilitate station moves to more centrally located or economical sites. Second, channels can made available for new DTV applications. Third, LPTV services and TV translators that have survived the transition to that point can be accommodated with output channels, or combined input and output channels, in an environment of spectrum plenty, with facilities designed for long-term sustainability, even if under secondary status. Fourth, contiguous blocks of spectrum can be reallotted, on a nation-wide basis. For example, Channels 60 to 69 -- a zone comprised of 60 MHz -- could be reallocated in two blocks of 24 MHz and one block of 12 Mhz -- for public safety, for auction without use restriction, for expanded UHF broadcasting, or for all of these uses and more.

That is not, however, the path charted by the 5R&O and 6R&O. Instead, the Commission appears bent on reallocating Channels 60 to 69 and they alone as soon as possible, with some portion allotted for public safety and the remainder marked down for a quick "fire sale" in a depressed spectrum market.[1] At best, the Commission has failed to compile a record and has failed to set forth reasons that would justify this approach.

That an extreme spectrum shortage for television broadcasting exists in the top markets is shown by data in this proceeding itself. The Commission often has stated that Channels 60 - 69 are the least desirable channels allotted for television, because of coverage efficiencies and related electrical power needs. "In this regard, we noted that only 97 of the almost 1600 television licensees operate on channels 60-69," 6R&O, ¶37. Yet as indicated in Table 1 hereto, a digest of top-five market NTSC and DTV loadings, 16 of these stations are in the top five markets. Why? Because they had no other choice. Similarly, even though the Commission's draft DTV Table used these channels only as a last resort, in 30 instances nation-wide, nine of the instances in the final Table -- nearly a third -- were in the top five markets, see Table 1.

At the other extreme of market size, when this proceeding rang down the curtain on new full service NTSC applications, there remained only twelve vacant and unapplied for VHF commercial allotments within 55 miles of any named ADI core city, and eight of these were in markets sized 201-225. Virtually all markets outside the top 100 either had a vacant channel or had room to add one -- or several -- within the spacings. The Commission's

1 Mark Landler, "Airwave Auctions Falter as Source of Funds for U.S.," New York Times, April 3, 1997, page one.

assignment and transfer records also would indicate these intense disparities. Top market stations are sold for prices in the hundreds of millions; top-twenty station for prices into the "teens," and top 100 stations for prices in the low seven figures. Outside the top 100 markets, no more than two or three local stations in the market are likely to have positive cash flow, and their resale market is turgid.

This TV broadcast congestion in the very top markets has unknown implications for the build-out of DTV. The Commission has decided that stations affiliated with a Big Four network in the ten largest markets must complete construction by May 1, 1999, i.e. less than two years hence, 5R&O, ¶76. The hoped-for rapid implementation of DTV hinges importantly on the vast population of these markets being served from early on. But the field work to that end is only just beginning. If new towers or significant site moves are necessitated, beyond those nominally permitted by rule, there is likely to be a complex period of adjustment, before these facilities are operational. Particularly in such key crowded markets as New Jersey, and the surrounding metroplexes of New York and Philadelphia, one significant site move could create a daisy chain, affecting the facilities of several other stations, and disrupting the idealized pattern of allotments.

The Commission's treatment of these issues is most unsatisfactory. In explaining its decision not to make heavier use of Channels 60 to 69, as Broadcasters had urged, the Commission assumes that "almost 99% of all existing NTSC services areas and viewers will be unaffected by the implementation of DTV operations," 6R&O, ¶78, and that "95% of all DTV allotments would provide at least 95% service area replication," (Id., assuming 1 MW DTV build-outs). The first figure assumes that all licensees will be able to build as authorized *on paper*, without the need for site changes necessitated by tower availability, microwave STL path reconfiguration, or other adaptations to the real world. In short, all this remains to be seen.

The second figure is doubly confusing. First, it masks the fact that the major sacrifices in replication occur precisely in those key markets with few satisfactory second channels for Network owned-and-operated major VHF and other vital service. Second, it assumes that none of these stations will solve their congestion problems by building downward, away from replication and toward the only level of service required, principal community coverage.

Given this unstable situation, it is at least premature to declare surplus all unused but fully-spaced channels in the band from 60-69, until more is known. The danger in this approach is well illustrated by the land mobile interests who joined in battle in this Docket, almost channel for channel, to protect the spectrum they were granted years ago in major markets, 6R&O, ¶¶152-165.

Turning to the record for land mobile spectrum needs, it is worth remembering that land mobile parties have been notoriously imprecise in documenting their spectrum shortages. In the

Commission's 1995 "Report and Plan, Meeting State and Local Government Public Safety Agency Spectrum Needs Through the Year 2010" (FCC 95-55, February 9, 1995) the Commission complained:

> In response to,our request to justify its projections of public safety needs, APCO filed additional information that consisted primarily of examples . . . . [p. 25]
>
> Although APCO, for example, has quantified its spectrum needs, it has not provided any explanation as to how these projections were developed and how they relate to current and projected spectrum shortages. [p. 30]

The record in this proceeding, as to public safety needs, is completely preoccupied with the top five markets: Philadelphia, 6R&O, ¶153; New York, San Francisco and Los Angeles, ¶155; San Francisco and Los Angeles County, ¶156; Philadelphia and New Jersey, ¶¶157, 159, 160; Los Angeles, San Francisco and New Jersey, ¶164; Philadelphia once more, ¶165. For all that appears in this record, there are no documented public safety spectrum needs outside the top five markets.

The Commission has stated that it intends "very shortly" to begin a reallocation of 24 MHz for public safety, from Channels 60 to 69, ¶80. Ideally such a reallotment would be contiguous, fungible, interoperable. But obviously, NTSC incumbents and DTV newcomers will need to be grandfathered and protected throughout the transition. <u>Table 1</u> lists the channels that would be protected. For New Jersey, for example, New York channels 68, 62, 67 and 66 are precluded, while Philadelphia channels 64, 67, 65 and 69 are precluded. That leaves only the ad hoc grouping of channels 60, 61, and 63. Elsewhere the story is much the same.

In Los Angeles, Channels 60, 61, 62, 63, 65, 66, 68 and 69 are blocked, and the Commission is left with the ad hoc grouping of Channels 64 and 67. What purpose would be served by these impaired, temporary and piecemeal arrangements? After the transition, it would be possible cleanly to allot, for example, Channels 60-63 or 66-69 in every major market in the United States, so that public safety communications could be truly interoperable and standardized, with more than enough spectrum.

The Commission's approach to public safety, while mottled, might have merit if there were no existing TV services adversely affected. But such is not the case. In the Sixth Further Notice herein, the Commission stated that, "Based on the proposed DTV Table, we estimate that about 55 to 65 per cent of existing LPTV operations and about 80 to 90 per cent of all TV translators would be able to continue to operate." [¶66] These estimates were based upon assumed co-channel and adjacent-channel impact of the proposed allotments within up to 80 miles of the new allotments. Affected stations were casually assumed to be able to migrate to another channel:

> We also note that many current TV channels have fewer than 100 LPTV or TV translator stations nationwide, while many other channels have significantly more than 100 such stations. We therefore believe that with more intensive utilization of the remaining channels, it should be possible to accommodate many LPTV and TV translator operations that are displaced. [Id.]

This observation is recapitulated in the 6R&O, ¶114. It goes without saying that Petitioners, operating in major markets, are in exactly those places where the migratory openings are the least likely to be found.

In the recent actions, the Commission has backed away from even these estimates, and only stated that the palliative measures here adopted will preserve "many existing low power operations" and will open many new channels for these stations that might be displaced by DTV. "We estimate that these changes will permit hundreds of LPTV and TV translator stations to continue providing service to their viewers," 6R&O, ¶143.

There being licensed today nearly five thousand VHF and UHF translators, and nearly two thousand additional LPTV stations, this claim for the new rules cannot be seen as very encouraging. Moreover, it appears that these characterizations still are nothing more than a guess. The surmise that as many as 35 per cent to 45 per cent of existing LPTV operations will have to cease certainly alarms Petitioners, and may prove accurate.

In rationalizing the intention to proceed with reallotment of Channels 60 to 69, the Commission avers:

> With regard to LPTV and TV translator stations, we continue to believe that the principal impact on low power operations will be from the accommodation of all full service broadcasters with a second channel for DTV. [6R&O, ¶81]

Again this appears to be a belief, supported by nothing more than supposition and conjecture. There are probative data to suggest otherwise. Exhibit 2 herewith is an adaptation from a recent TV data base, showing among other things the number of translators in each State of the Union currently using an output channel from

Channel 60 to Channel 69. Most striking are the following States:

| | Per cent of translators using 60 -- 69 |
|---|---|
| Hawaii | 50 % (N=15) |
| Virginia | 30 % (N=30) |
| ~~Minnesota~~ Michigan | 28% |
| Pennsylvania | 27% |
| New York | 26% |
| Minnesota | 28% |
| Texas | 24% |
| Arizona | 21% |
| Florida | 21% |
| New Mexico | 21% |
| Oklahoma | 21% |
| Oregon | 20%. |

A few states with a smaller percentage have a large absolute number of facilities at risk with the Commission's plan:

| | |
|---|---|
| California | 18% (N=82) |
| Colorado | 14% (N=92) |
| Utah | 10% (N=55). |

For each of these states, the Commission's supposition of lack of impact from its reallotment scheme is simply incorrect.

For these reasons Petitioners, recognizing that Channels 60 to 69 will not be usable for television broadcasting after 2006, or whatever final date marks the transition, most earnestly submit that this drastic disfigurement await the reversion of channels that will render it merely costly, but not fatal.

## 2. There are Additional Concrete Steps the Commission Can Take to Facilitate the LPTV and Translator Transition.

The Commission has deferred to a future proceeding the general authorization of DTV on low power television and TV translator stations. Petitioners look forward to participating, and we hope that this proceeding will be underway at an early date. Certainly, LPTV's should have a clear pathway to a DTV switchover, no later than DTV implementation for full service TV. At the Commission's behest, the major markets are expected to inaugurate new DTV operations quickly. In the meantime, we do note a few points where the relief accorded LPTV licensees can be clarified or strengthened.

Coordination. The Commission will entertain private agreements to refine the channelization plan and resolve interference conflicts, 6R&O, ¶182. The decision admonishes that coordinating committees "are strongly advised that they should consider LPTV and TV translator stations. . . ." [Id.]. This hortatory language appears to petitioners woefully inadequate. The Commission needs to be mindful that urban LPTV's are actual competitors, albeit with fewer resources than their fellow broadcasters. The Commission should fortify this language to indicate that coordinated solutions will not be considered, unless they include proof of actual meeting notice to affected LPTV's and translators, actual consultation with them, and actual service of copies of Commission submissions with the opportunity to comment separately. Basic fairness would indicate that these steps be taken, but the Commission will not be warranted in assuming these things happened, absent an express directive.

Displacement relief. In major markets, the need for displacement relief is virtually self-evident. Moreover, it will not be a useful deployment of staff resources to parse individual relief showings. In any location affected by multiple channels being added for DTV, the Commission should presume a need for displacement relief, based upon a concise, sworn statement of the grounds by the applicant. Displacement relief should be treated as a minor modification of the license, and the affected station should be accorded a liberal time to modify, for example 24 months or until the switch-on of a precluding service, whichever later occurs.

Priorities between licensees and new applicants. In time it should be possible, with new settled separation and interference criteria, to re-open filings for LPTV stations and translators, i.e. to phase out the present window filing approach, completely, or through a measured, monitored and staged plan. Petitioners submit that this can and should happen soon, but not until an adequate opportunity for incumbent licensees and permittees to appraise the likely impact, and protect a new (displacement) channel through early filing.

### 3. Keeping A Sense of Proportion

In its DTV implementation the Commission will appraise, as it must, the calculus of public interest gains and losses from the particulars of the plan. With respect to urban LPTV the numbers are far from adequate to tell the story. Urban LPTV's have taken root in nearly every major market. This has happened against the backdrop of a fixed number of available channels for TV broadcasting, a quota that was used up many years ago. Early in the proceeding, the Commission in 1987 froze the acceptance of new TV applications within 150 miles of 30 urban cores -- in effect through the top 100 markets.

Petitioners' and other LPTV services that came into existence were able to customize in response to local interests and language and ethnic groupings that never could hope to acquire a major market full service TV station. Many are minority owned concerns. To a modest degree, these low power television stations have introduced new programs, new ideas, a small breath of competition. The Commission should tread carefully where the very survival of these stations during the transition is in issue.

**4. Conclusion.**

For the reasons set forth, Petitioners request that the Commission reconsider the Fifth Report and Order and Sixth Report and Order, in light of the considerations here expressed.

Respectfully submitted,

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**EXHIBIT 1.**
**OLD AND NEW ALLOTMENTS, TOP FIVE MARKETS**
**Channel 60 -- Channel 69**

* Asterisk denotes near, but outside primary service area

(1) New York

| Facility | NTSC | DTV |
|---|---|---|
| Newark, NJ | 68 | |
| Kingston, NY | 62 | |
| *Smithtown, NY | 67 | |
| *West Milford, NJ | 66 | |

(2) Los Angeles

| Facility | NTSC | DTV |
|---|---|---|
| Los Angeles 2 | | 60 |
| Los Angeles 5 | | 68 |
| Los Angeles 11 | | 65 |
| Los Angeles 13 | | 66 |
| Riverside | 62 | |
| San Bernardino 18 | | 61 |
| *San Diego | 69 | |
| *Oxnard | 63 | |

(3) Chicago

| Facility | NTSC | DTV |
|---|---|---|
| Joliet | 66 | |
| Hammond, IN | 62 | |
| *Milwaukee, WI 18 | | 61 |

Table 1, contd.

(4) Philadelphia

| Facility | NTSC | DTV |
| --- | --- | --- |
| Philadelphia 6 | | 64 |
| Philadelphia 10 | | 67 |
| Allentown | 69 | |
| Vineland, NJ | 65 | |

(5) San Francisco

| Facility | NTSC | DTV |
| --- | --- | --- |
| Concord 42 | | 63 |
| Novato | 68 | |
| San Mateo | 60 | |
| San Jose | 65 | |
| Vallejo | 66 | |
| *Monterey | 67 | |

**EXHIBIT 1A.**
**PRECLUSIONARY LOADINGS, TOP FIVE MARKETS, BY CHANNEL,**
**Channel 69 -- Channel 60**

Channel 69

| Facility | NTSC | DTV |
|---|---|---|
| *San Diego | 69 | |
| Allentown | 69 | |

Channel 68

| Facility | NTSC | DTV |
|---|---|---|
| Newark, NJ | 68 | |
| Los Angeles 5 | | 68 |
| Novato, CA | 68 | |

Channel 67

| Facility | NTSC | DTV |
|---|---|---|
| *Smithtown, NY | 67 | |
| Philadelphia 10 | | 67 |
| *Monterey | 67 | |

Channel 66

| Facility | NTSC | DTV |
|---|---|---|
| *West Milford, NJ | 66 | |
| Los Angeles 13 | | 66 |
| Joliet | 66 | |
| Vallejo | 66 | |

Channel 65 Table 2, cont'd.

| Facility | NTSC | DTV |
|---|---|---|
| Los Angeles 11 | | 65 |
| Vineland, NJ | 65 | |
| San Jose | 65 | |

Channel 64

| Facility | NTSC | DTV |
|---|---|---|
| Philadelphia 6 | | 64 |

Channel 63

| Facility | NTSC | DTV |
|---|---|---|
| *Oxnard | 63 | |
| Concord 42 | | 63 |

Channel 62

| Facility | NTSC | DTV |
|---|---|---|
| Kingston, NY | 62 | |
| Riverside | 62 | |
| Hammond, IN | 62 | |

Channel 61

| Facility | NTSC | DTV |
|---|---|---|
| San Bernardino 18 | | 61 |
| *Milwaukee, WI 18 | | 61 |

Channel 60

| Facility | NTSC | DTV |
|---|---|---|
| Los Angeles 2 | | 60 |
| San Mateo | 60 | |

Exhibit No. 2.

| | | | |
|---|---|---|---|
| **ALASKA** | | | |
| Number of Licenses | | | 581 |
| Number of Construction Permits | | | 45 |
| Number of Applications | | | 19 |
| Total LPTV/Translators | | | 645 |
| Licenses: | Channel | 60+ | 17 |
| Construction Permits: | Channel | 60+ | 6 |
| Applications: | Channel | 60+ | 0 |
| Total LPTV: | Channel | 60+ | 23 |
| **ALABAMA** | | | |
| Number of Licenses | | | 47 |
| Number of Construction Permits | | | 24 |
| Number of Applications | | | 6 |
| Total LPTV/Translators | | | 77 |
| Licenses: | Channel | 60+ | 9 |
| Construction Permits: | Channel | 60+ | 3 |
| Applications: | Channel | 60+ | 1 |
| Total LPTV: | Channel | 60+ | 13 |
| **ARKANSAS** | | | |
| Number of Licenses | | | 50 |
| Number of Construction Permits | | | 46 |
| Number of Applications | | | 43 |
| Total LPTV/Translators | | | 139 |
| Licenses: | Channel | 60+ | 7 |
| Construction Permits: | Channel | 60+ | 13 |
| Applications: | Channel | 60+ | 9 |
| Total LPTV: | Channel | 60+ | 29 |
| **ARIZONA** | | | |
| Number of Licenses | | | 241 |
| Number of Construction Permits | | | 38 |
| Number of Applications | | | 58 |
| Total LPTV/Translators | | | 337 |
| Licenses: | Channel | 60+ | 52 |
| Construction Permits: | Channel | 60+ | 4 |
| Applications: | Channel | 60+ | 10 |
| Total LPTV: | Channel | 60+ | 66 |
| **CALIFORNIA** | | | |
| Number of Licenses | | | 454 |
| Number of Construction Permits | | | 104 |
| Number of Applications | | | 167 |
| Total LPTV/Translators | | | 725 |
| Licenses: | Channel | 60+ | 82 |
| Construction Permits: | Channel | 60+ | 9 |
| Applications: | Channel | 60+ | 38 |
| Total LPTV: | Channel | 60+ | 129 |

| | | |
|---|---|---|
| COLORADO | | |
| Number of Licenses | | 628 |
| Number of Construction Permits | | 36 |
| Number of Applications | | 30 |
| Total LPTV/Translators | | 694 |
| Licenses: | Channel 60+ | 92 |
| Construction Permits: | Channel 60+ | 1 |
| Applications: | Channel 60+ | 11 |
| Total LPTV: | Channel 60+ | 104 |
| CONNECTICUT | | |
| Number of Licenses | | 14 |
| Number of Construction Permits | | 1 |
| Number of Applications | | 6 |
| Total LPTV/Translators | | 21 |
| Licenses: | Channel 60+ | 1 |
| Construction Permits: | Channel 60+ | 0 |
| Applications: | Channel 60+ | 0 |
| Total LPTV: | Channel 60+ | 1 |
| DISTRICT OF COLUMBIA | | |
| Number of Licenses | | 4 |
| Number of Construction Permits | | 0 |
| Number of Applications | | 2 |
| Total LPTV/Translators | | 6 |
| Licenses: | Channel 60+ | 1 |
| Construction Permits: | Channel 60+ | 0 |
| Applications: | Channel 60+ | 1 |
| Total LPTV: | Channel 60+ | 2 |
| DELAWARE | | |
| Number of Licenses | | 6 |
| Number of Construction Permits | | 2 |
| Number of Applications | | 3 |
| Total LPTV/Translators | | 11 |
| Licenses: | Channel 60+ | 2 |
| Construction Permits: | Channel 60+ | 0 |
| Applications: | Channel 60+ | 0 |
| Total LPTV: | Channel 60+ | 2 |
| FLORIDA | | |
| Number of Licenses | | 127 |
| Number of Construction Permits | | 61 |
| Number of Applications | | 43 |
| Total LPTV/Translators | | 231 |
| Licenses: | Channel 60+ | 27 |
| Construction Permits: | Channel 60+ | 10 |
| Applications: | Channel 60+ | 5 |
| Total LPTV: | Channel 60+ | 42 |

GEORGIA

| | | |
|---|---|---|
| Number of Licenses | | 60 |
| Number of Construction Permits | | 45 |
| Number of Applications | | 22 |
| Total LPTV/Translators | | 127 |
| Licenses: | Channel 60+ | 10 |
| Construction Permits: | Channel 60+ | 7 |
| Applications: | Channel 60+ | 3 |
| Total LPTV: | Channel 60+ | 20 |

GUAM

| | | |
|---|---|---|
| Number of Licenses | | 2 |
| Number of Construction Permits | | 0 |
| Number of Applications | | 0 |
| Total LPTV/Translators | | 2 |
| Licenses: | Channel 60+ | 0 |
| Construction Permits: | Channel 60+ | 0 |
| Applications: | Channel 60+ | 0 |
| Total LPTV: | Channel 60+ | 0 |

HAWAII

| | | |
|---|---|---|
| Number of Licenses | | 30 |
| Number of Construction Permits | | 34 |
| Number of Applications | | 9 |
| Total LPTV/Translators | | 73 |
| Licenses: | Channel 60+ | 15 |
| Construction Permits: | Channel 60+ | 9 |
| Applications: | Channel 60+ | 2 |
| Total LPTV: | Channel 60+ | 26 |

IOWA

| | | |
|---|---|---|
| Number of Licenses | | 35 |
| Number of Construction Permits | | 68 |
| Number of Applications | | 43 |
| Total LPTV/Translators | | 146 |
| Licenses: | Channel 60+ | 9 |
| Construction Permits: | Channel 60+ | 14 |
| Applications: | Channel 60+ | 10 |
| Total LPTV: | Channel 60+ | 33 |

IDAHO

| | | |
|---|---|---|
| Number of Licenses | | 244 |
| Number of Construction Permits | | 45 |
| Number of Applications | | 40 |
| Total LPTV/Translators | | 329 |
| Licenses: | Channel 60+ | 27 |
| Construction Permits: | Channel 60+ | 11 |
| Applications: | Channel 60+ | 6 |
| Total LPTV: | Channel 60+ | 44 |

| | | |
|---|---|---|
| **ILLINOIS** | | |
| Number of Licenses | | 40 |
| Number of Construction Permits | | 19 |
| Number of Applications | | 15 |
| Total LPTV/Translators | | 74 |
| Licenses: | Channel 60+ | 6 |
| Construction Permits: | Channel 60+ | 6 |
| Applications: | Channel 60+ | 3 |
| Total LPTV: | Channel 60+ | 15 |
| **INDIANA** | | |
| Number of Licenses | | 37 |
| Number of Construction Permits | | 7 |
| Number of Applications | | 8 |
| Total LPTV/Translators | | 52 |
| Licenses: | Channel 60+ | 7 |
| Construction Permits: | Channel 60+ | 1 |
| Applications: | Channel 60+ | 3 |
| Total LPTV: | Channel 60+ | 11 |
| **KANSAS** | | |
| Number of Licenses | | 45 |
| Number of Construction Permits | | 14 |
| Number of Applications | | 3 |
| Total LPTV/Translators | | 62 |
| Licenses: | Channel 60+ | 6 |
| Construction Permits: | Channel 60+ | 5 |
| Applications: | Channel 60+ | 0 |
| Total LPTV: | Channel 60+ | 11 |
| **KENTUCKY** | | |
| Number of Licenses | | 28 |
| Number of Construction Permits | | 18 |
| Number of Applications | | 20 |
| Total LPTV/Translators | | 66 |
| Licenses: | Channel 60+ | 2 |
| Construction Permits: | Channel 60+ | 3 |
| Applications: | Channel 60+ | 6 |
| Total LPTV: | Channel 60+ | 11 |
| **LOUISIANA** | | |
| Number of Licenses | | 45 |
| Number of Construction Permits | | 44 |
| Number of Applications | | 33 |
| Total LPTV/Translators | | 122 |
| Licenses: | Channel 60+ | 8 |
| Construction Permits: | Channel 60+ | 11 |
| Applications: | Channel 60+ | 8 |
| Total LPTV: | Channel 60+ | 27 |

| MASSACHUSETTS | | |
|---|---|---|
| Number of Licenses | | 12 |
| Number of Construction Permits | | 3 |
| Number of Applications | | 6 |
| Total LPTV/Translators | | 21 |
| Licenses: | Channel 60+ | 4 |
| Construction Permits: | Channel 60+ | 0 |
| Applications: | Channel 60+ | 1 |
| Total LPTV: | Channel 60+ | 5 |

| MARYLAND | | |
|---|---|---|
| Number of Licenses | | 11 |
| Number of Construction Permits | | 5 |
| Number of Applications | | 4 |
| Total LPTV/Translators | | 20 |
| Licenses: | Channel 60+ | 3 |
| Construction Permits: | Channel 60+ | 2 |
| Applications: | Channel 60+ | 0 |
| Total LPTV: | Channel 60+ | 5 |

| MAINE | | |
|---|---|---|
| Number of Licenses | | 29 |
| Number of Construction Permits | | 22 |
| Number of Applications | | 10 |
| Total LPTV/Translators | | 61 |
| Licenses: | Channel 60+ | 2 |
| Construction Permits: | Channel 60+ | 3 |
| Applications: | Channel 60+ | 1 |
| Total LPTV: | Channel 60+ | 6 |

| MICHIGAN | | |
|---|---|---|
| Number of Licenses | | 63 |
| Number of Construction Permits | | 115 |
| Number of Applications | | 21 |
| Total LPTV/Translators | | 199 |
| Licenses: | Channel 60+ | 17 |
| Construction Permits: | Channel 60+ | 22 |
| Applications: | Channel 60+ | 3 |
| Total LPTV: | Channel 60+ | 42 |

| MINNESOTA | | |
|---|---|---|
| Number of Licenses | | 275 |
| Number of Construction Permits | | 30 |
| Number of Applications | | 19 |
| Total LPTV/Translators | | 324 |
| Licenses: | Channel 60+ | 79 |
| Construction Permits: | Channel 60+ | 5 |
| Applications: | Channel 60+ | 2 |
| Total LPTV: | Channel 60+ | 86 |

| | | |
|---|---|---|
| **MISSOURI** | | |
| Number of Licenses | | 54 |
| Number of Construction Permits | | 54 |
| Number of Applications | | 38 |
| Total LPTV/Translators | | 146 |
| Licenses: | Channel 60+ | 6 |
| Construction Permits: | Channel 60+ | 15 |
| Applications: | Channel 60+ | 9 |
| Total LPTV: | Channel 60+ | 30 |
| **MISSISSIPPI** | | |
| Number of Licenses | | 27 |
| Number of Construction Permits | | 50 |
| Number of Applications | | 9 |
| Total LPTV/Translators | | 86 |
| Licenses: | Channel 60+ | 1 |
| Construction Permits: | Channel 60+ | 11 |
| Applications: | Channel 60+ | 2 |
| Total LPTV: | Channel 60+ | 14 |
| **MONTANA** | | |
| Number of Licenses | | 359 |
| Number of Construction Permits | | 45 |
| Number of Applications | | 30 |
| Total LPTV/Translators | | 434 |
| Licenses: | Channel 60+ | 36 |
| Construction Permits: | Channel 60+ | 14 |
| Applications: | Channel 60+ | 4 |
| Total LPTV: | Channel 60+ | 54 |
| **NORTH CAROLINA** | | |
| Number of Licenses | | 118 |
| Number of Construction Permits | | 28 |
| Number of Applications | | 17 |
| Total LPTV/Translators | | 163 |
| Licenses: | Channel 60+ | 13 |
| Construction Permits: | Channel 60+ | 5 |
| Applications: | Channel 60+ | 2 |
| Total LPTV: | Channel 60+ | 20 |
| **NORTH DAKOTA** | | |
| Number of Licenses | | 32 |
| Number of Construction Permits | | 26 |
| Number of Applications | | 2 |
| Total LPTV/Translators | | 60 |
| Licenses: | Channel 60+ | 4 |
| Construction Permits: | Channel 60+ | 3 |
| Applications: | Channel 60+ | 0 |
| Total LPTV: | Channel 60+ | 7 |

| | | |
|---|---|---|
| NEBRASKA | | |
| Number of Licenses | | 101 |
| Number of Construction Permits | | 18 |
| Number of Applications | | 22 |
| Total LPTV/Translators | | 141 |
| Licenses: | Channel 60+ | 14 |
| Construction Permits: | Channel 60+ | 6 |
| Applications: | Channel 60+ | 3 |
| Total LPTV: | Channel 60+ | 23 |
| NEW HAMPSHIRE | | |
| Number of Licenses | | 12 |
| Number of Construction Permits | | 3 |
| Number of Applications | | 5 |
| Total LPTV/Translators | | 20 |
| Licenses: | Channel 60+ | 1 |
| Construction Permits: | Channel 60+ | 0 |
| Applications: | Channel 60+ | 1 |
| Total LPTV: | Channel 60+ | 3 |
| NEW JERSEY | | |
| Number of Licenses | | 11 |
| Number of Construction Permits | | 10 |
| Number of Applications | | 13 |
| Total LPTV/Translators | | 34 |
| Licenses: | Channel 60+ | 0 |
| Construction Permits: | Channel 60+ | 1 |
| Applications: | Channel 60+ | 0 |
| Total LPTV: | Channel 60+ | 1 |
| NEW MEXICO | | |
| Number of Licenses | | 291 |
| Number of Construction Permits | | 32 |
| Number of Applications | | 38 |
| Total LPTV/Translators | | 361 |
| Licenses: | Channel 60+ | 62 |
| Construction Permits: | Channel 60+ | 4 |
| Applications: | Channel 60+ | 5 |
| Total LPTV: | Channel 60+ | 71 |
| NEVADA | | |
| Number of Licenses | | 315 |
| Number of Construction Permits | | 17 |
| Number of Applications | | 27 |
| Total LPTV/Translators | | 359 |
| Licenses: | Channel 60+ | 44 |
| Construction Permits: | Channel 60+ | 4 |
| Applications: | Channel 60+ | 7 |
| Total LPTV: | Channel 60+ | 55 |